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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-57-64)
(August 28, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

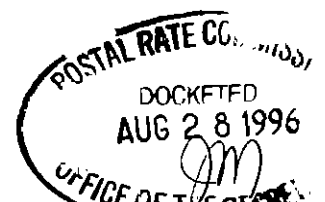
Respectfully submitted,

Emmett Rand Gist for

GAIL WILLETTE
Director
Office of the Consumer Advocate

David F. Ruderman

DAVID RUDERMAN
Attorney



OCA/USPS-57. Please refer to the computer data tapes for TRACS filed with SSR-84.

- a. Please provide the data and programs contained on these tapes on CD-ROM, in a format that can be used by PC SAS.
- b. Please provide all SAS data sets contained in SSR-84 in a format useable by PC SAS. For example, the City Carrier Cost System "z file" produced for library reference SSR-33 was in a form that could be accessed using PC SAS.

OCA/USPS-58. Please refer to the attachment to the response to OCA/USPS-21c. This response discusses the effects on weighting of differential employee sampling rates within cost pool. There was no mention of differential sampling rates within a cost pool in the table of employee sampling rates provided in response to OCA/USPS-T5-13b.

- a. Please provide complete sample design documentation for the IOCS that defines and describes all sampling rates used within each cost pool.
- b. Please define the substrata or other subparts of each stratum or cost pool sampled at each of the possible employee sampling rates within that stratum or cost pool.

OCA/USPS-59. Please refer to SSR-90, page 17. This states the assumptions relied on for producing IOCS estimates. The first assumption states, "At the first stage of selection, the method of estimation assumes that within CAGs C through J, the sample of offices in each CAG constitutes an equal probability sample." Are there any different assumptions regarding the selection of finance numbers for the certainty strata? Please explain.

OCA/USPS-60. Please refer to the response to OCA/USPS-T5-13. In attachments 1 and 2, sample design information was provided for CAGs A/B combined.

- a. Please break out the "A/B" row of attachment 1 to show the figures for CAG A and CAG B separately.
- b. Please break out the "A/B" column of attachment 2 to show the figures for CAG A and CAG B separately.

OCA/USPS-61. A review of SSR-82 indicates that program and data files for TRACS Highway and Rail appear to be limited to the fourth quarter of FY 95.

- a. Are the PQ495 files actually cumulative through the fourth quarter? Please explain.

- b. Are the PQ495 programs simply illustrative of the programs for the other quarters in FY 1995? Please explain.
- c. Are data files for the first three quarters of TRACS Highway and Rail systems provided in an MC96-3 library reference? If so, please specify which one.
- d. Are data files for the first three quarters of the TRACS Highway and Rail systems used for FY 1995 transportation cost distribution? If not, please explain.

OCA/USPS-62. Please refer to the description of the FY 1992 finance number restructuring in the response to OCA/USPS-T5-13 and to Attachment 1 to the response. The attachment shows that 96 CAG A/B finance numbers were not included in the FY 1995 IOCS certainty sample.

- a. Did the CRA auditor investigate effects of the finance number restructuring on cost estimates between FY 1993 and FY 1995? If so, please provide the results of any investigations or studies.
- b. Were the CRA auditors informed that (after restructuring and the normal advancements of CAG rankings between FY 1992 and FY 1995) the certainty strata excluded 96 of 600 finance numbers from the FY 1995 IOCS certainty strata? If so, did

they produce a report of this change? If a report was prepared, please provide a copy. If the auditors were not informed of the change in coverage of certainty strata finance numbers, please explain why not.

- c. Does the CRA auditor routinely challenge or investigate the validity of the statistical estimates underlying the CRA?
- d. Does the CRA auditor ever evaluate statistical systems underlying the CRA that were designed, maintained, or evaluated by the auditor's own firm? If so, please list all such cases.

OCA/USPS-63. Please list all changes in the TRACS sample design and estimation methodology between FYs 1993 and 1995 for each component of the TRACS system. Please explain the reason for each change implemented. This should include:

- a. Changes in stratum sample size for each stage of sampling.
- b. Changes in stratum universe size for each stage of sampling.
- c. Changes in data collected by the system.
- d. Changes in data collection instructions or manuals.
- e. Changes in the editing or coding of data.
- f. Changes in weighting methodology (provide old and new weighting formulas, if applicable).


- g. Changes in estimation methodology, and use of estimates for costing.
- h. Changes in variance estimation methodology (provide old and new variance formulas, if applicable).

OCA/USPS-64. Please refer to the January 1995 Handbook F-45 (SSR-12), pages v-vii. This section of the F-45 lists a summary of changes made to the CODES/IOCS software.

- a. This edition of Handbook F-45 is dated January 1995. Does this handbook cover the entire FY 1995 data collection year? If not, please provide all other editions of this handbook that are needed to cover the FY 1995 data collection year.
- b. How often is Handbook F-45 updated? What was the date of the most recent edition of Handbook F-45 prior to January 1995?
- c. Do the changes listed on pages v-vii cover all changes implemented since the FY 1993 F-45 instructions? If not, please provide additional lists of changes necessary to document all changes implemented since the FY 1993 F-45 instructions.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


DAVID RUDERMAN
Attorney

Washington, D.C. 20268-0002
August 28, 1996